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November 29, 2021

BY ECF

The Honorable Ann M. Donnelly
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Henkin, et al. v. Qatar Charity, et al.*, 21-cv-5716 (AMD), Request for Extension of Time

Dear Judge Donnelly:

We represent Qatar National Bank Q.P.S.C. (“QNB”), one of the defendants in the above-referenced action (the “Action”). We respectfully request an extension of time, until January 31, 2022, to respond to the Complaint. QNB anticipates moving to dismiss the Complaint, including on grounds of ineffective service, lack of personal and subject matter jurisdiction, and failure to state a claim. QNB will file a pre-motion letter well in advance of the January 31 date. Plaintiffs’ counsel have authorized us to advise the Court that Plaintiffs consent to our extension request. Because Plaintiffs assert that they served QNB by Federal Express on November 8, 2021, QNB’s deadline to respond to the Complaint is currently November 29, 2021. This is QNB’s first request for an extension.

Yesterday, Plaintiffs wrote to the Clerk of Court, requesting a judicial determination, pursuant to Rule 50.3.1 of the Guidelines for the Division of Business Among District Judges, Eastern District of New York, that this case and two other actions, *Force, et al. v. Qatar Charity, et al.*, 20-cv-2578 (BMC), and *Przewozman, et al. v. Qatar Charity, et al.*, No. 20-cv-6088 (NGG), are “related” within the meaning of the rule. See *Przewozman, et al. v. Qatar Charity, et al.*, No. 20-cv-6088 (NGG), ECF No. 29. In *Przewozman*, QNB has requested, likewise on Plaintiffs’ consent, that Judge Garaufis extend the deadline for QNB’s response to the Complaint to January 31, 2022; defendant Masraf Al Rayan (“MAR”) earlier requested the same extension, which Judge Garaufis granted. QNB intends to seek a similar extension, also on Plaintiffs’ consent, in *Force*.¹

Accordingly, QNB respectfully requests that Your Honor extend to January 31, 2022, the deadline for QNB’s response to the Complaint in the Action.

¹ Plaintiffs assert that QNB and MAR were properly served in all three actions on November 8, 2021. (See *Przewozman, et al. v. Qatar Charity, et al.*, No. 20-cv-6088 (NGG), ECF No. 23 at 1.)

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Respectfully submitted,

/s/ Michael G. McGovern

Michael G. McGovern

cc: All counsel of record (by ECF)